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*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Orbin Zaldivar,

Plaintiff,

*-against-*

Case No.: 2:23-cv-01434  
(NCM)(LGD)

JANL, Inc. d/b/a Sergio's Pizzeria & Restaurant, Sergio  
Olivero, Severina Olivero and Luciano Olivero a/k/a Louis  
Olivero,

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Defendants.

**NOTICE OF MOTION FOR DEFAULT JUDGMENT PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 55(b)(2)**

PLEASE TAKE NOTICE that, on a date and time to be determined by the Court, the undersigned, attorneys for plaintiff Orbin Zaldivar shall move before the Honorable Natasha C. Merle, United States District Judge, at the United States District Court, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, for a default judgment against defendants JANL, Inc. and Sergio Oliver, pursuant to Federal Rule of Civil Procedure 55(b)(2). In support of this motion, Plaintiff submits the Memorandum of Law in Support of Plaintiffs Motion for Default Judgment Pursuant to Federal Rule of Civil Procedure 55(b)(2), (3) the Declaration of Steven J. Moser in support thereof, with exhibits thereto, and the Declaration of the Plaintiff Orbin Zaldivar.

A proposed order for default judgment is annexed to this Notice of Motion.

Dated: Huntington, New York  
April 16, 2024

Respectfully submitted,  
MOSER LAW FIRM, P.C.



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